

REMARKS

The examiner is thanked for the performance of a thorough search. No claims are canceled or added and claims 1-42 are pending. The amendments to the claims as indicated herein do not add any new matter to this application. Furthermore, amendments made to the claims as indicated herein have been made to exclusively improve readability and clarity of the claims and not for the purpose of overcoming alleged prior art. Each issue raised in the Office Action mailed March 5, 2007 is addressed hereinafter.

I. ISSUES NOT RELATING TO PRIOR ART

Claims 13-22 stand rejected under 35 U.S.C. §101 as allegedly directed to non-statutory subject matter. Present claim 13 recites a practical application for the claimed invention in the form of physical transformation(s) or a useful, concrete and tangible result. The specification has been amended to clarify a distinction between computer-readable storage media and transmission media, and the claims feature storage media. Further, independent claim 13 recites "storing the HTML user interface page in a computer-readable storage medium." Storing information recites a useful, concrete and tangible result. Still further, the entire body of the claim recites a transformation of one kind of data (business objects) into another kind of data (an HTML user interface page). Therefore, the claim recites statutory subject matter.

Claims 14-22 depend directly or indirectly from claim 13 and therefore include the subject matter of claim 13. Accordingly, claims 14-22 necessarily recite statutory subject matter.

Reconsideration is respectfully requested.

Paragraph [0049] and [0057] of the specification are amended to correct typographical errors.

II. ISSUES RELATING TO PRIOR ART

A. CLAIMS 1-42—ABBOTT ET AL.

Claims 1-42 stand rejected under 35 U.S.C. §102(b) as allegedly anticipated by Abbott et al. US Publication 2003/0046401 (“Abbott”). The rejection is respectfully traversed.

A rejection under §102 is traversed if the claims recite one or more features, elements, steps or limitations that are not found in the cited reference. Stated another way, the cited reference must teach or disclose each and every feature of the claims, arranged as in the claims. *See Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 1548, 220 USPQ 193, 198 (Fed. Cir. 1983). The claims of the present application contain features not found in the reference, and therefore the rejection is overcome.

Abbott describes techniques for selecting a user interface (UI) from among a plurality of pre-specified, existing UIs (see Abbott paragraph [0030]), based on factors such as the user’s type of input device, output device type (e.g., PDA versus desktop computer), desired cognitive load, privacy, and safety. See Abbott FIG. 9. In sharp contrast, applicants’ claimed approach is for dynamically generating **elements** within **one** user interface so that the overall appearance of the elements is consistent even when different applications use different underlying business logic.

The difference of the approaches is immediately apparent from Abbott FIG. 12-13, which show UI Design A, UI Design B, UI Design C. These UI designs are inconsistent with one another. Abbott relates to selecting one of designs A, B, and C that is most appropriate for a particular user context. In contrast, applicants’ approach uses only **one** UI (for example, the preamble of claim 1 recites **a** user interface in the singular) and involves generating **elements** **within the UI** with a consistent appearance even when underlying business objects of applications are different.

The Office Action contends at page 4 that Abbott teaches “... once the URL or target location is being processed through the computer device to be displayed, the graphical user interface is created dynamically to match a consistent user interfaces as defined by the operator, so it generates that target location. ... Instead of generating every window at once, the system can generate each window as it goes through target-by-target location dynamically creating a new user interface or a slight or drastic modification of the original user interface (manufacture defined).” This is incorrect. Abbott has no such disclosure and the Office Action cites no paragraph of Abbott allegedly having such a teaching. The closest description in Abbott to what the Office Action proposes is FIG. 5-7 of Abbott, which show selecting among multiple pre-existing UIs at runtime, **but not dynamically generating elements within a particular UI to ensure consistency across multiple applications.**

Abbott comprises 4,020 paragraphs of text and the Office has the burden to identify what parts of Abbott disclose each and every feature of the claimed invention in the same arrangement as claimed. Applicants are not required to search and rebut such a voluminous reference in the absence of specific citations in the Office Action. Specific citations are requested.

The Office Action further states: “Of course those skilled in the art will appreciate that taking from this idea and having the system make up all of the graphical user interfaces tailored to one design (for a plurality of users) it would only fall under being an obvious variant in the scope of creating a graphical user interface for a plurality of users scenario to a user-by-user basis scenario for one graphical user interface design opposed to each user having there own design of the graphical user interface sought to be used. Which in turns is a consistent user interface on a user-by-user basis and having just one is broadening the scope of the presented material therein by Abbott ...” Applicants do not believe they fully understand the Office’s rationale because these sentences are confusing in grammar and meaning. As best understood,

the Office Action is contending that the approach of claim 1 would have been an obvious variant of Abbott in 2004 at the time the present application was filed because Abbott allegedly describes creating a consistent user interface for one user and could be adapted for creating consistent user interfaces for multiple users. Applicants disagree. Abbott has **no hint or suggestion** about how to “make up all of the graphical user interfaces tailored to one design (for a plurality of users).” Abbott describes, at most, selecting among multiple UIs, but has no description of how to make the elements within one UI consistent when multiple different applications are generating information for display in the UI.

Further, the rationale of the Office Action overlooks or ignores many specific features recited in applicants’ claim 1. The Office Action appears to have recast applicants’ claims at a high level of abstraction and then applied a summary of Abbott to the recast abstraction. This is incorrect. Claim 1, for example, recites business objects, a controller, actions, widgets, interaction of actions with objects through service object module interfaces, and functions for associating service object parameter values with widgets, placing widgets in panels, and generating an HTML user interface page with the panel. Claim 1 recites using actions to obtain business object parameter values, and to select widgets based on the parameter values. Abbott has no disclosure of these specifically claimed features. Page 4 of the Office Action makes no attempt to correlate any particular statement in Abbott with any specifically claimed feature. Therefore, page 4 of the Office Action cannot support the rigorous requirements for an anticipation rejection under 35 U.S.C. §102(a).

Under the heading “As for independent claim 1,” the Office Action relies on FIG. 2 and paragraph 0034 of Abbott to show all elements of claim 1. This is incorrect. Claim 1 recites elements and features not found in Abbott. For example, claim 1 recites:

a service object manager coupled to the controller and to the business objects, and configured to supply service object parameter values from the business objects and metadata elements to the actions;
wherein the controller comprises logic configured to receive a user request from the browser and to dispatch the user request to one or the actions;
wherein **the actions comprise logic configured to interact with the business objects through the service object manager to obtain service object parameter values for the actions ...**

Abbott has no description of a service object manager or any way to provide parameter values from business objects to actions. Abbott has no description of functional elements termed “actions” or any equivalent element and no description of the actions obtaining parameter values from the business objects. Further, these elements are not inherent in Abbott since there could be many other ways to solve the problems addressed by the claims and there is no reason based on Abbott that a skilled artisan would elect applicants’ claimed approach. Abbott FIG. 2 and paragraph [0034] are so vague and non-specific that they fail to disclose anything to a skilled artisan about how to achieve the approach of applicants’ claims. Reconsideration of claim 1 is respectfully requested.

For claim 2, the Office Action contends that “receiving one or more business objects that each define a user action for the application program” is found in Abbott paragraph 2053. This is incorrect. Paragraph 2053 refers to design elements of a UI, but the quoted part of the claim is referring to objects that define user actions **for the application program**, not the UI. The Office Action contends that “receiving one or more metadata elements defining parameters for the user actions of the business object” is found in Abbott paragraph 409. This is incorrect. Paragraph 409 refers to message content of received messages, but there is no indication that such message content defines parameters for user actions, as claimed. For the claim feature “invoking a

controller . . . actions, widgets and panels,” the Office Action relies on Abbott FIG. 2, but that drawing has no depiction of “actions” as claimed or described in applicants’ specification.

Claim 2 further recites “obtaining, using the actions, one or more parameter values from the business objects; associating, using the actions, the business object parameter values with a widget selected from among the one or more widgets . . .” The Office Action relies on Abbott paragraph 2057, FIG. 2, and FIG. 5. Paragraph 2057 refers to “attributes” of UI design characterizations, not parameter values of business objects of applications. FIG. 2 and FIG. 5 do not show using actions, as claimed and described by applicants, to obtain parameter values of application business objects and then select widgets based on the parameter values.

The Office has asserted a rejection for anticipation in view of Abbott under 35 U.S.C. §102. However, Abbott lacks numerous clearly claimed features of the independent claims and has a description so general and high-level that it cannot be applied to the claims with any particularity. Anticipation requires the presence in a single prior art disclosure of all elements of a claimed invention arranged as in the claim. “A prior art disclosure that ‘almost’ meets that standard does not ‘anticipate.’” *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 220 USPQ 193, 198 (Fed. Cir. 1983). Abbott does not satisfy the requirements for anticipation. Reconsideration of claim 2 is respectfully requested.

Each of the other independent claims 12, 13, 23, and 33 recites the features described above and is allowable for the same reasons given above for claim 2. Reconsideration is respectfully requested.

B. DEPENDENT CLAIMS

Each of the dependent claims depends, directly or indirectly, on one of claims 1, 2, 12, 13, 23, and 33, and therefore incorporates by dependency each of the features described above that distinguishes the base independent claim from Abbott. Therefore, each of the dependent

claims is allowable over Abbott for the same reasons given above for claims 1, 2, 12, 13, 23, and 33.

Further, the dependent claims recite features that independently render them patentable. For example, claims 6, 17, 27 and 37 recite “generating, using the widget, client-side executable program code that performs one or more data validation or access control operations on user input for the user operation.” The Office Action relies on FIG. 5, FIG. 12, and paragraphs 799 and 842 of Abbott. This is incorrect. FIG. 5 and FIG. 12 say nothing about generating client side code that performs data validation or access control operations on user input as part of generating using the widget. In applicants’ approach a consistent user interface is assured by automatically generating appropriate client-side data validation code based on what actions and widgets are used. Paragraphs 799 and 842 of Abbott consist of three words in total: “Privacy” and “Processing Capabilities.” These three words do not disclose the concept or specifics of claims 6, 17, 27 and 37.

Similarly, claims 7, 18, 28, and 38 recite “receiving a user request comprises receiving a user request from the browser and dispatching the user request to one or the actions, wherein the actions interact with the business objects through service object module interfaces that provide parameter values for the business objects to the actions.” The Office Action relies on FIG. 5-7, 11, 12, and paragraph 573. The Office Action appears to be disregarding the “wherein” clause referring to interaction with actions and service object module interfaces. FIG. 5-7, 11, and 12 say nothing about **using actions**, as described and claimed by applicants, to interact with **application business objects through SOM interfaces that provide the parameter values**. Paragraph 573, read in context with paragraphs 566 and 571, is also immaterial and fails to describe actions to obtain parameter values.

Many other examples could be given, but because of the fundamental differences between the independent claims and the reference that have been previously discussed, a detailed discussion of the remaining dependent claims is deferred.

C. REFERENCES LACKING SPECIFIC CITATIONS

Applicants respectfully disagree with certain implications of the first two paragraphs of page 9 of the Office Action. The Office has the burden of proof with respect to anticipation. An Office Action will be complete as to all matters, 37 C.F.R. § 1.104, so that the applicants need not make inferences from the reference or consider the claims rejected upon a part of a reference that is not cited in the Office Action. While applicants understand that the Office has cited Abbott as a whole, the applicants are not required to search a 4,000-paragraph reference and establish why the claims are patentable over portions that are not expressly relied upon in the Office Action. Instead, when “a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable.” 37 C.F.R. § 1.104(c)(2).

Applicants disagree that the references cited but not relied upon relate to methods and system of creating consistent graphical user interfaces.

II. CONCLUSIONS & MISCELLANEOUS

For the reasons set forth above, all of the pending claims are now in condition for allowance. The Examiner is respectfully requested to contact the undersigned by telephone relating to any issue that would advance examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a law firm check for the petition for extension of time fee is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of this

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REPLY TO OFFICE ACTION

application, the Commissioner is hereby authorized to any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,
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